

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 19-00029-01-CR-W-BCW
	)	
WILLIE LEWIS BRAISON,	)	
	)	
Defendant.	)	

**MOTION FOR CONTINUANCE  
WITH SUGGESTIONS**

COMES NOW the defendant, Willie Lewis Braison, by and through his counsel, William J. Raymond, Assistant Federal Public Defender for the Western District of Missouri, in accordance with Rule 47, Fed. R. Crim. P., and Rule 7.1 (b) and (c) of the Local Rules of Procedure for the United States District Court for the Western District of Missouri, and moves this Court, pursuant to 18 U.S.C. §3161(h)(7)(A) and (B), to remove this case from the Accelerated Joint Criminal Trial Docket scheduled to commence March 25, 2019 and to move it the Accelerated Joint Criminal Trial Docket scheduled to commence on February, 2020.

**SUGGESTIONS IN SUPPORT OF MOTION FOR CONTINUANCE**

1. On January 17, 2019, defendant was charged by criminal complaint with violations of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A), Possession with Intent to Distribute methamphetamine. On January 25, 2019, defendant was charged by indictment with violations 21 U.S.C. §§841(a)(1) and (b)(1)(A), Possession with Intent to Distribute Methamphetamines; 21 U.S.C. §§841(a)(1) and (b)(1)(A), Possession with Intent to Distribute Heroin.

2. On January 17, 2019, the office of the Federal Public Defender was appointed to

represent defendant.

3. Undersigned counsel needs additional time to review and discuss discovery with defendant.

4. William Alford, Assistant United States Attorney, has indicated that he has no objection to this continuance request.

5. This continuance is sought not for purpose of dilatory delay, but is sought in truth and fact that the defendant may be afforded due process of law under the Fifth Amendment to the United States Constitution. In accordance with 18 U.S.C. §3161(h)(7)(A) and (B)(iv), it is submitted that the above-stated reasons for a continuance outweigh the best interests of the public and the defendant to a speedy trial, which is required by 18 U.S.C. §3161(c)(1).

6. Under the provisions of 18 U.S.C. §3161(h)(7)(A) the period of time until the next criminal trial docket should be excluded in computing the period of time in which the defendant should be brought to trial under the provisions of the Speedy Trial Act.

WHEREFORE, the defendant, Willie Lewis Braison, respectfully requests this Court, pursuant to 18 U.S.C. §3161(h)(7)(A) and (B), to remove this case from the Accelerated Joint Criminal Trial Docket scheduled to commence March 25, 2019 and to move it the Accelerated Joint Criminal Trial Docket scheduled to commence on February, 2020.

Respectfully submitted,

/s/ William J. Raymond  
WILLIAM J. RAYMOND  
Assistant Federal Public Defender  
818 Grand, Suite 300  
Kansas City, MO 64106  
(816) 471-8282  
COUNSEL FOR DEFENDANT

**CERTIFICATE OF SERVICE**

In accordance with Rule 49(a), (b) and (d), Fed. R. Crim. P., and Rule 5(b), Fed. R. Civ. P., it is hereby CERTIFIED that the foregoing motion was electronically filed on this 4th day of March, 2019, and that a copy was sent to all attorneys of record, pursuant to the Electronic Case Filing system.

/s/ William J. Raymond  
William J. Raymond